

**FILED**

DISTRICT COURT OF GUAM

FEB 20 2007

MARY L.M. MORAN  
CLERK OF COURT

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Counterclaimant S.J. GARGRAVE SYNDICATE 2724

**IN THE DISTRICT COURT OF GUAM**

**TERRITORY OF GUAM**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

INCHAPE SHIPPING SERVICES GUAM,  
LLC,

Plaintiff in Intervention,

vs.

MARWAN SHIPPING & TRADING CO.,  
FIVE SEAS SHIPPING CO., LLC, and S.J.  
GARGRAVE SYNDICATE 2724, *in*  
*personam*,

Defendants.

AND CROSS-CLAIMS, COUNTERCLAIM,  
AND CLAIM IN INTERVENTION

Civil Case No.: 06-00011

**S.J. GARGRAVE SYNDICATE 2724'S  
PRIVILEGE LOG RE MERMG FILE**

Complaint Date: April 19, 2006  
Trial Date: None Set

11620/0002/616012.1

GARGRAVE PRIV. LOG RE MERMG FILE  
Civil Case No.: 06-00011

**ORIGINAL**

1 Defendant, Cross-Claimant and Counterclaimant s S.J. GARGRAVE SYNDICATE 2724  
2 (hereinafter "Gargrave") provides herewith its privilege log with respect to the file of Marine  
3 Environmental Response Management Group, LLC ("MERMG").  
4

5 Dated this 19 day of February, 2007.

6 THOMAS M. TARPLEY, JR.  
7 A Professional Corporation

8 By: 

9 THOMAS M. TARPLEY, JR.,  
10 Attorney for Defendant, Cross-Claimant  
11 and Counterclaimant S.J. GARGRAVE  
12 SYNDICATE 2724  
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**CERTIFICATE OF SERVICE**

I, Thomas M. Tarpley, Jr., hereby certify pursuant to Rule 5(d) Fed. R. Civ. P. that on February 20, 2007, I caused to be served a true and correct copy of the **S.J. GARGRAVE SYNDICATE 2724'S PRIVILEGE LOG RE MERMG FILE**, to the following:

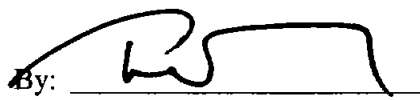
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Dated this 20 day of February, 2007.

THOMAS M. TARPLEY, JR.  
A Professional Corporation

By:   
THOMAS M. TARPLEY, JR.,  
Attorney for Defendant, Cross-Claimant  
and Counterclaimant S.J. GARGRAVE  
SYNDICATE 2724

**AJMAN II -- PRIVILEGE LOG**

<b>No.</b>	<b>Date of Document</b>	<b>Author</b>	<b>Primary Addressee</b>	<b>Secondary Addressee</b>	<b>Type of Document</b>	<b>Attorneys</b>	<b>Subject Matter</b>	<b>Privilege Claimed</b>
1.	March 23, 2005	Forrest Booth	Insurers at Interest	Graeme Sprowson	Report letter	Cozen O'Connor	Status report	Attorney-Client, Attorney Work Product
2.	June 22, 2005	Forrest Booth	Insurers at Interest	None	Report letter	Cozen O'Connor	Status report	Attorney-Client, Attorney Work Product
3.	None	Ken Meyer	MERMG File	None	Log	Cozen O'Connor	Attorneys' reserve recommendation	Attorney Work Product
4.	May 26, 2005	Forrest Booth	Insurers at Interest	Graeme Sprowson	Email report	Cozen O'Connor	Attorneys' report to Underwriters	Attorney-Client, Attorney Work Product
5.	December 10, 2004	Lars Perkins	Underwriters at Interest c/o John Boyt	Darren Nuding	Email	Cozen O'Connor	Legal advice re choice of law analysis	Attorney Work Product
6.	June 14, 2005	Forrest Booth	Insurers at Interest c/o John Boyt	Graeme Sprowson	Email report	Cozen O'Connor	Attorneys' report to Underwriters	Attorney-Client, Attorney Work Product
7.	June 17, 2005	Forrest Booth	Insurers at Interest c/o John Boyt	Graeme Sprowson	Email report	Cozen O'Connor	Attorneys' report to Underwriters	Attorney-Client, Attorney Work Product
8.	May 23, 2005	Ken Meyer	Insurers at Interest c/o John Boyt	EPG, LLC	Letter	Cozen O'Connor	Attorneys' editing and approval of draft letter	Attorney-Client, Attorney Work Product

No.	Date of Document	Author	Primary Addressee	Secondary Addressee	Type of Document	Attorneys	Subject Matter	Privilege Claimed
9.	June 14, 2005	John Boyt	Ken Meyer	None	Email	Cozen O'Connor	Request from insurers for legal advice	Attorney-Client; Attorney Work Product
10.	June 18, 2005	Forrest Booth	Insurers at Interest	Graeme Sprowson	Email report	Cozen O'Connor	Attorneys' report to Underwriters	Attorney-Client; Attorney Work Product
11.	June 15, 2005	Graeme Sprowson	Forrest Booth	John Boyt	Email	Cozen O'Connor	Discussion of legal advice	Attorney-Client
12.	June 14, 2005	Forrest Booth	Insurers at Interest c/o John Boyt	Graeme Sprowson	Email report	Cozen O'Connor	Attorneys' report to Underwriters	Attorney-Client; Attorney Work Product
13.	February 1, 2005	Ken Meyer	Insurers at Interest c/o John Boyt	Forrest Booth	Letter	Cozen O'Connor	Forwarding legal advice	Attorney Work Product
14.	None	Ken Meyer	MERMG File	None	Log	Cozen O'Connor	Legal advice	Attorney Work Product
15.	January 25, 2005	Forrest Booth	Insurers at Interest c/o John Boyt	Graeme Sprowson	Email report	Cozen O'Connor	Attorneys' report to Underwriters	Attorney-Client; Attorney Work Product
16.	July 18, 2005	Forrest Booth	Insurers at Interest c/o John Boyt	Graeme Sprowson	Email	Cozen O'Connor	Legal advice	Attorney-Client; Attorney Work Product
17.	July 13, 2005	John Boyt	Forrest Booth	Ken Meyer	Email	Cozen O'Connor	Request from insurers for legal advice	Attorney-Client; Attorney Work Product